



IN THE U.S. DISTRICT COURT OF MARYLAND
FOR DISTRICT OF MARYLAND

Josh Cannon, et al

*

Plaintiffs

*

v.

*

Case No. 17-1889 RDB

Sunset Grille, LLC, et al.

*

Defendants

*

/

DECLARATION OF HOWARD B. HOFFMAN

1. I, Howard B. Hoffman, Esq., am at least 18 years of age and competent to testify, and I am not a party to, or related to a party, in this action. I serve as counsel to the Plaintiffs in the above-referenced matter.
2. I am an attorney in private practice, and I concentrate on employment law. From 1999 to 2002, I practiced in two prominent boutique employment law firms representing management clients. I have been practicing law since December 1999. I am admitted to the Maryland bar (since 1999), the District of Columbia bar (since 2007), and the Virginia bar (since 2015), as well as the U.S. Court of Appeals for the Fourth Circuit, the U.S. District Court for the District of Maryland,¹ and the U.S. District Court for Eastern District of Virginia. I have extensive experience prosecuting and defending wage and hour cases and other employment law cases. I opened my own firm in 2002.
3. I have maintained time and costs records in this case, which I have placed into "RocketMatter"© software. The time records set forth as Exhibit 3-A are true and correct records of time entries inputted on a daily basis, and are contemporaneous business records held in the ordinary course by my private law practice. The time records reflect

actual time expended in the prosecution of this litigation (the “RocketMatter” entries have not been placed into the Court’s required lodestar billing format). The time incurred is a reasonable amount, necessarily incurred in order to complete basic objectives in the prosecution of this matter. The time reflects the number of issues that the Defendants have or could raise as a defense in this case. I have also, to the fullest extent practical, specified the time spent per task, and I have avoided the practice of block billing.

4. Through today’s date (December 15, 2017), I have incurred a minimum of 51.6 hours in this case at \$400.00/hour (see below for basis for this claimed hourly rate), for a total value of \$20,640.00. I was generally responsible for all matters and facets of this case, except that I brought on Bradford W. Warbasse, Esq., a lawyer with a separate legal practice, to assist with damage calculations and other aspects of discovery. Mr. Warbasse has incurred 12.6 hours in this case, valued at \$5,040.00. Mr. Warbasse exclusively practices employment law, and has done so since being admitted to the bar in December 1985. Mr. Warbasse’s time sheet is attached hereto as Exhibit 3-B.
5. My itemized and reimbursable listed costs in this case are \$3,668.45, consisting of the filing fee, postage, expert witness fees, and process server charges. Not included in the itemized costs are the costs involved in extensive computerized legal research (I utilize WESTLAW).
6. Therefore, the total fees and costs incurred to date are \$28,948.45.
7. By accepting \$25,000.00 for fees and cost reimbursement to Plaintiff’s FLSA claims, I am therefore discounting (“writing down”) part of my time as it relates to this settlement. Notably, these fees and costs were negotiated separately and secondarily, and only after reaching a tentative resolution as to the Plaintiff’s recovery.

¹ I gained admission to this Court in January 2000.

8. In the course of representing businesses and some individuals, I include and bill to my clients any disbursements representing the same costs incurred in this case (e.g., postage, copies, conference calls, court reporters, experts, etc.).
9. I am an honors graduate of University of Maryland School of Law (May, 1999), where I was the recipient of the “Shawe & Rosenthal” employment law prize, and the “Joseph Bernstein Prize” (for excellence in legal writing). I have been a member of the Maryland bar since December 1999 and this Court since January 2000. I have been a Contributing Revisions Editor, Fair Labor Standards Act (BNA/ABA) since 2002. Together with Bradford Warbasse, Esq., I was asked to speak at a seminar in December 2012, for Maryland Employment Lawyers Association titled “Bringing Your First FLSA Collective Action: The Guts and Glory Of Overtime Wage Cases.” I was selected to speak at a Lorman seminar in June 2013 to discuss principles of law under the FLSA. Most recently, I received the honor of being designated a “SuperLawyer”® in Maryland employment law.
10. As stated, I have extensive experience in prosecuting and defending wage and hour lawsuits, and that makes me rather uniquely qualified to provide this Declaration. Many of the well-known reported decisions in the District of Maryland addressing overtime and minimum wage rights, are cases that I have either prosecuted (represented the employee) or defended (represented the employer). These notable and widely cited decisions include, but are not limited to: Rose v. New Day Financial, et al., 816 F.Supp.2d 245, 2011 WL 4103276 (D. Md. Oct. 5, 2011) (Quarles, J.) (represented employer; motion to compel class-waiver arbitration granted); Chapman et al. v. Ourisman Chevrolet Co., Inc., 2011 WL 2651867 (D. Md. 2011) (Williams, J.) (representation of employee class

in minimum wage dispute; summary judgment for employer denied); Williams et al. v. ezStorage Corp., 2011 WL 1539941 (D. Md. Apr. 21, 2011) (Bennett, J.) (conditional certification of FLSA collective action on behalf of employees); Gionfriddo et al. v. Jason Zink, LLC, et al., 769 F.Supp.2d 880 (D. Md. 2011) (Bennett, J.) (represented employer in FLSA case; granting motion for decertification); Dorsey et al. v. The Greene Turtle Franchising Corp., 2010 WL 3655544 (D. Md. 2010) (Blake, J.) (represented employees; grant of conditional certification of FLSA collective action); Williams et al. v. Long (d/b/a "Charm City Cupcakes"), 585 F.Supp.2d 679 (D. Md. 2008) (Grimm, J.) (represented employees; grant of conditional certification of FLSA collective action (widely cited in District)); Spencer v. Central Services, LLC, et al., Case No. CCB-10-3469, 2012 WL 142978 (D. Md. Jan. 13, 2012) (grant of attorneys' fees and costs in FLSA case); Dorsey et al. v. TGT Consulting, LLC, 888 F.Supp.2d 670, 2012 WL 3629209 (D. Md. Aug. 20, 2012) (Blake, J.) (holding employee's earning statements were insufficient to inform employees of FLSA's tip credit requirements); Saman v. LDBP, Inc., 2012 WL 5463031 (D. Md. Nov. 7, 2012) (Chasanow, J.) (dismissal of supplemental state claim of wrongful discharge in FLSA case). Several of the aforementioned decisions resulted in additional precedent setting decisions in that same case, although they are not cited here.

11. Additionally, while I would like to remain modest about my accomplishments in my eighteen (18) years of practice, two of the more frequently cited published decisions involving the First Amendment rights of law enforcement whistleblowers, decided by the U.S. Court of Appeals for the Fourth Circuit within the last decade, are cases that I prosecuted on behalf law enforcement whistleblowers, see, e.g., Andrew v. Clark, 561

F.3d 261 (4th Cir. 2009) (representation of law enforcement officer in claim of First Amendment retaliation and due process); Durham v. Jones, 737 F.3d 291 (4th Cir. 2013) (affirming judgment of judgment was obtained in the amount of \$1,112,200.00 against Somerset County Sheriff; defeating claims of qualified immunity in First Amendment retaliation case).

12. Moreover, my work frequently casts me into the spotlight. By way of example, I have been quoted, or my work has been featured, in the following news articles: “Deputy Gets Powers Back,” The Maryland Daily Record, Pg. 1A, Aug. 14, 2013; “Tip & Fight; Famed Baltimore Restaurant Sip & Bite on the Hook for Unfair Labor Practices,” Baltimore City Paper (“Mobtown Beat column”), Aug. 21, 2013; “Sheriff Owes Deputy \$1.1M,” The Maryland Daily Record, Pg. 1A, December 11, 2013; “Pet Peeve – Outcry Over Baltimore County Animal Shelter Erupts in Free-Speech Lawsuit,” Baltimore City Paper (“Mobtown Beat column”), June 4, 2014; “State Courts Can Decide Overtime Disputes, Enhance Damages,” The Maryland Daily Record, Pg. 1A, Aug. 18, 2014. My Section 1983 work on behalf of animal advocates in Baltimore County, Fancy Cats Rescue Team, Inc., et al. v. Baltimore County, Md., et al., BPG 14-1073, gained nationwide attention. See <http://www.chicagotribune.com/lifestyles/pets/ct-pets-shelter-silence-0129-20150129-story.html> (“Bredar's decision could have implications around the country.”)
13. I have not charged (and will not charge) any Plaintiff in this case for any of the costs or fees that have been incurred in this case. No contingency fee is being charged to any Plaintiff.
14. To calculate the Plaintiffs’ losses, I hired an expert witness, Elana Schulman, CPA/CFE, whose work has been recognized by this Court. See Mould v. NJG Food Services, Inc.,

et al., JKB 13-1305, 2013 WL 6331286, *17 (D. Md. Dec. 4, 2013) (Bredar, J.) (Observing in an FLSA case, “[t]he Court agrees with the general principle behind Ms. Schulman’s calculation.”). A true and correct copy of the summary of Ms. Schulman’s calculations is attached as Exhibit 1 to the Joint Motion for Approval of FLSA Settlement.


15. I believe that the compromised amount is fair and reasonable for a variety of reasons, some of which involve attorney work product protected impressions. One significant issue in this case, which was raised during discovery, concerned the number of “off-the-clock” hours that Plaintiffs believed that they were owed. As part of this settlement, Plaintiff Wallace will receive \$6,175.38 from Defendant Micky Fins, LLC and \$15,992.56 from Sunset Grille, LLC. Plaintiff Cannon will receive \$39,944.09 from Sunset Grille, LLC.
16. In recovering \$6,175.38 from Defendant Micky Fins, LLC, Plaintiff Wallace is receiving approximately 1.5x of his calculated compensatory loss. In recovering \$15,992.56 from Sunset Grille, LLC, Plaintiff Wallace is receiving approximately 1.66x of his calculated compensatory loss. In recovering \$39,944.09, Plaintiff Cannon is recovering is receiving approximately 1.66x of his calculated compensatory loss. The total range of loss is set forth in Exhibit 3-C.
17. In my opinion, the payment of these sums as settlement to the Plaintiffs, with no legal fees or costs charged to the Plaintiffs, represent fair and reasonable resolutions to their FLSA claims, based on my experience handling scores of FLSA cases and the specific issues involved in this case. Naturally, each Plaintiff supports the settlement outcome in this case.

18. Before I began my eighteenth year of practice, I received awards of \$300.00 an hour, under an old lodestar guideline, in the following cases: Chapman et al. v. Ourisman Chevrolet Co., Inc., 2011 WL 2651867 (D. Md. 2011) (Williams, J.) (granting \$300.00/hour to Hoffman based on review of credentials and declarations of attorneys in the community); Spencer v. Central Services, LLC, et al., Case No. CCB-10-3469, 2012 WL 142978 (D. Md. Jan. 13, 2012) (Blake, J.) (granting Hoffman \$300.00/hour in attorneys' fees, referring to Hoffman's work as "laudable", and granting all time requested by Hoffman in an FLSA case); Durham v. Jones, WMN 10-2534, 2012 WL 3985224 (D. Md. Sept. 10, 2012) (Nickerson, J.) (granting Hoffman \$300.00/hour, and remarking that Hoffman's timesheets "thoroughly account[ed]" for claimed hours). I was most recently awarded an increase to \$400/hour in Jackson et al.v. Egira, LLC, et al., RDB 14-3114, 2016 WL 5815850 (D. Md. Oct. 5, 2016).

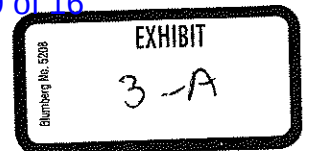
16. I am requesting that the Court value my time at a rate of \$400.00 an hour in this case, *although the effective hourly rate is lower as I have discounted my legal fees and costs in the interest of settlement*. I think this rate is consistent with the revised Lodestar Guidelines adopted by the U.S. District Court, especially for an attorney who regularly handles precedent-setting decisions, whose work attracts and receives media attention, and who regularly speaks on employment law topics, including to fellow attorneys. The complexity, duration, and skill required in this case deserve a rate of \$400.00.

DECLARANT FURTHER SAYETH NAUGHT

I solemnly affirm under the penalties of perjury that the contents of the foregoing are true and correct.


Howard B. Hoffman, Esq.

December 15, 2017



Howard B. Hoffman, Attorney at Law

600 Jefferson Plaza Suite 304
 Rockville, MD 20852
 Phone: 301-251-3752 | Fax: 301-251-3753

PRE-BILL

Josh Cannon

Invoice Date: December 15, 2017
 Invoice Number: Pre-bill
 Invoice Amount: \$23,908.45

Matter: In re Sunset Grille FLSA Litig.

Attorney's Fees

2/25/2017	Lengthy tele conf. with client re wage/hour claims.	H.B.H.	.90	\$360.00
2/26/2017	Research re corporate charter; follow up tele conf. with client re wage/hour claims.	H.B.H.	.40	\$160.00
3/1/2017	Draft ltr of representation.	H.B.H.	.10	\$40.00
3/28/2017	Tele conf. with J. Cannon re status of matter.	H.B.H.	.20	\$80.00
4/19/2017	Tele conf. with J. Cannon re status of matter, including claims re individual liability.	H.B.H.	.30	\$120.00
5/19/2017	Extensive tele conf. with Melvin Wallace re dates and hours of work, pleading facts.	H.B.H.	1.30	\$520.00
5/21/2017	Tele conf. with J. Cannon re status of matter.	H.B.H.	.10	\$40.00
5/31/2017	Tele conf. with J. Cannon re factual claims.	H.B.H.	.50	\$200.00
7/4/2017	Draft comm. to J. Cannon re pleading issues.	H.B.H.	.10	\$40.00
7/4/2017	Review file materials and draft complaint.	H.B.H.	3.60	\$1,440.00
7/5/2017	Review file materials. Draft Complaint. Tele conf. with J. Cannon re same.	H.B.H.	4.30	\$1,720.00
7/6/2017	Tele conf. with J. Cannon; review response re draft lawsuit.	H.B.H.	.10	\$40.00
7/8/2017	Multi comm with client (Cannon) re status of matter.	H.B.H.	.20	\$80.00
7/8/2017	Review and revise Complaint. Draft proposed summons. Draft civil cover sheet. Open case via ECF.	H.B.H.	2.10	\$840.00
7/10/2017	Review summons issued by Court.	H.B.H.	.10	\$40.00
7/13/2017	Tele conf. with M. Wallace re status of matter.	H.B.H.	.30	\$120.00
7/19/2017	Draft letter to R. Gudelsky re lawsuit, inviting settlement negotiations. Prepare service for two corporate defendants. Draft memo of instruction to process server. Prepare materials and transmit via	H.B.H.	1.00	\$400.00

	US Priority Mail.			
7/20/2017	Draft letter to clients re attaching correspondence re service of process (and settlement), advising of status of matter.	H.B.H.	.20	\$80.00
7/25/2017	Tele conf. with process server re status of matter.	H.B.H.	.10	\$40.00
7/26/2017	Tele conf. with RG re status of matter.	H.B.H.	.10	No Charge
8/10/2017	Tele conf. with J. Vander Woude re service extension request and status of matter.	H.B.H.	.10	\$40.00
8/14/2017	Review filing of Notice of Appearance (Vander Woude) and filing of Stipulation.	H.B.H.	.10	\$40.00
8/14/2017	Review and revise Stipulation (extension). Draft comm. to J. Johnson re same.	H.B.H.	.50	\$200.00
8/16/2017	Review filing of appearance by J. Johnson.	H.B.H.	.10	\$40.00
8/27/2017	Draft Interrogatories from MW to Micky Fins. Review and revise. (.7 hrs). Draft Interrogatories from MW to Sunset Grille. Review and revise. (.7 hrs). Draft Interrogatories from JC to Sunset Grille. Review and revise. (.6 hrs).	H.B.H.	2.00	\$800.00
9/1/2017	Review Scheduling Order.	H.B.H.	.10	\$40.00
9/1/2017	Review and revise Interrogatories. Draft Request for Admissions. Prepare materials and transmit.	H.B.H.	.80	\$320.00
9/1/2017	Review Answer and related filings. (.3 hrs). Draft comm. to clients updating of the filing of an Answer.	H.B.H.	.50	\$200.00
9/6/2017	Extensive tele conf. with J. Cannon re letter from Vander Woude.	H.B.H.	1.20	\$480.00
9/6/2017	Preliminary review of letter from Vander Woude.	H.B.H.	.30	\$120.00
9/6/2017	Draft comm. to clients re letter from defendants' counsel (re claims and defenses).	H.B.H.	.20	\$80.00
9/6/2017	Tele conf. with M. Wallace re allegations in letter and strategies moving forward.	H.B.H.	.40	\$160.00
9/7/2017	Review comm. from J. Cannon re ltr from Vander Woude.	H.B.H.	.10	\$40.00
9/15/2017	Tele conf. with E. Schulman re expert calcs.	H.B.H.	.30	\$120.00
9/18/2017	Draft comm. to J. Vander Woude re status of matter (and records produced).	H.B.H.	.10	\$40.00
9/25/2017	Review comm from VanderWoude re status of matter.	H.B.H.	.10	\$40.00
9/26/2017	Review ltr from VanderWoude and attachments. Draft multi page response letter; review and revise. Transmit.	H.B.H.	3.80	\$1,520.00
9/27/2017	Review and respond to comm. from Johnson re status of discovery.	H.B.H.	.10	\$40.00
9/27/2017	Tele conf. with E. Schulman re expert calculations.	H.B.H.	.20	\$80.00
9/27/2017	Review response from VanderWoude.	H.B.H.	.10	\$40.00
9/28/2017	Review calculations of M. Wallace re Sunset Grille. Forward same with comm. to J. VanderWoude.	H.B.H.	.20	\$80.00
10/2/2017	Review responses to Request for Admissions.	H.B.H.	.20	\$80.00
10/3/2017	Review filing of Notice of Appearance re BWV.	H.B.H.	.10	\$40.00
10/4/2017	Tele conf. with J. Cannon and BWV re facts; discuss wage/hour records.	H.B.H.	.70	\$280.00

10/4/2017	Tele conf. with BWB and MW re hour of work records and wage payment records and comparison of same and discussion of case status and strategy.	H.B.H.	.60	\$240.00
10/4/2017	Tele conf. with BWB re review of hour of work records in comparison to wage payment records re Cannon and discussion of allegations re same.	H.B.H.	.70	\$280.00
10/5/2017	Review comm. from Johnson re extension of time to answer; draft response.	H.B.H.	.10	\$40.00
10/5/2017	Transmit docket materials to BWB.	H.B.H.	.20	No Charge
10/11/2017	Review comm. from M. Wallace re wage/hour claims.	H.B.H.	.10	\$40.00
10/12/2017	Draft comm. to opposing counsel re proposed amended complaint.	H.B.H.	.20	\$80.00
10/15/2017	Tele conf. with BWB re M. Wallace timeline re Micky Fin's.	H.B.H.	.20	\$80.00
10/16/2017	Reviewing filing of Motion for Leave to File Amended Complaint.	H.B.H.	.10	\$40.00
10/16/2017	Multi tele conf. with BWB re Motion for Leave to File First Amended Complaint; briefly review same. Prepare redline.	H.B.H.	.70	\$280.00
10/17/2017	Tele conf. with M. Wallace re status of matter.	H.B.H.	.20	\$80.00
10/18/2017	Review Errata re Motion for Leave to File Amended Complaint.	H.B.H.	.10	\$40.00
10/19/2017	Draft comm. to JJ re status of documents. Review response.	H.B.H.	.10	\$40.00
10/19/2017	Draft comm. to opposing counsel re status of matter.	H.B.H.	.10	\$40.00
10/19/2017	Draft Request for Production of Documents; review and revise. Transmit	H.B.H.	1.60	\$640.00
10/19/2017	Draft multi page ltr to opposing counsel re deficiencies in written discovery. (1.7 hrs).	H.B.H.	1.70	\$680.00
10/24/2017	Tele conf. with BWB re expert calcs and issues re same.	H.B.H.	.30	\$120.00
10/24/2017	Draft comm. to VanderWoude re status of matter.	H.B.H.	.10	\$40.00
10/25/2017	Review discovery letter; Tele conf with BWB and JV re discovery issues.	H.B.H.	.50	\$200.00
10/30/2017	Review draft report. Multi tele conf. with BWB. Multi tele conf. with E. Schulman. Confer with both BWB and E. Schulman. Draft Expert Designation; review and revise. Prepare materials and transmit to counsel via email and US mail.	H.B.H.	3.40	\$1,360.00
10/31/2017	Review comm. from J. Johnson re amended answers.	H.B.H.	.10	\$40.00
10/31/2017	Draft comm. to opposing counsel re revisions to discovery and discovery disputes. Confr with BWB re same.	H.B.H.	.30	\$120.00
11/3/2017	Review comm. from BWB re M. Atkins.	H.B.H.	.10	\$40.00
11/3/2017	Review comm. from Vander Woude re settlement. Tele conf. with BWB re same.	H.B.H.	.30	\$120.00
11/6/2017	Review time records and draft lodestar statement.	H.B.H.	.30	\$120.00
11/7/2017	Multi comm. with J. Vander Woude re settlement discussions, discovery issues.	H.B.H.	1.20	\$480.00

11/7/2017	Revise lodestar letter; transmit.	H.B.H.	.10	\$40.00
11/7/2017	Draft comm. to clients re status of matter.	H.B.H.	.20	\$80.00
11/8/2017	Multi tele conf. with clients re settlement. Tele conf. with J. Vander Woude re settlement. Multi lengthy comm. with Vander Woude re same.	H.B.H.	1.50	\$600.00
11/11/2017	Review atty time records; draft comm to Vander Woude re same.	H.B.H.	.20	\$80.00
11/14/2017	Review and respond to J. Vander Woude re fee/costs.	H.B.H.	.10	\$40.00
11/15/2017	Review and respond to multi comm with JV re settlement of fees and costs. Conf with BWV re same.	H.B.H.	.20	\$80.00
11/27/2017	Continue drafting Settlement Agreement; review and revise. Draft Joint Motion; review and revise. Draft proposed Order. Review and revise.	H.B.H.	4.70	\$1,880.00
11/28/2017	Comm with clients re status of matter.	H.B.H.	.20	\$80.00
12/4/2017	Draft comm. to JV re status of matter; review response.	H.B.H.	.10	\$40.00
12/6/2017	Review revisions by JV to settlement agreement and settlement motion. Draft comm. to JV re same. Review response.	H.B.H.	.70	No Charge
12/12/2017	Multi comm. with clients re signature of settlement agreement and completion of tax forms. Prepare and transmit documents via docusign. Review same and resend. Prepare email to JV re signed settlement agreement. Transmit materials via US Priority Mail.	H.B.H.	.70	\$280.00
12/15/2017	Draft Attorney Affidavit; review and revise. Review and revise Motion for Approval. Prepare materials and file via ECF.	H.B.H.	1.30	\$520.00
SUBTOTAL:			51.60	\$20,240.00

Costs

7/8/2017	Filing Fee			\$400.00
7/25/2017	Service of Process			\$150.00
9/7/2017	Postage - MW			\$1.40
10/2/2017	Expert - E. Schulman, Inv. 1116			\$1,636.00
10/19/2017	Postage - JV			\$1.61
11/1/2017	Postage - ES			\$0.49
11/2/2017	Expert - E. Schulman, Inv. 1121			\$1,473.00
12/12/2017	Priority Mail - JV			\$5.95
SUBTOTAL:				\$3,668.45

Matter Ledgers

SUBTOTAL:

Trust Account

12/15/2017	Previous Balance			\$0.00
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Available in Trust:

\$0.00

TOTAL \$23,908.45

PREVIOUS BALANCE DUE \$0.00

CURRENT BALANCE DUE AND OWING \$23,908.45

EXHIBIT

3-B

BRADFORD W. WARBASSE
 ATTORNEY AT LAW
 401 WASHINGTON AVENUE
 SUITE 200
 TOWSON, MARYLAND 21204
 TELEPHONE (410) 337-5411
 FAX NUMBER (410) 938-8668
 EMAIL: warbasselaw@gmail.com

Cannon, et al. v. Sunset Grille, LLC, et al.
BWW TIME

Date	Time	Description
10/4/17	1.5	Conf. call w/ HBH and Cannon (.5); Conf. call w/ HBH and Wallace (.4); Review payroll and hour of work records (.6).
10/6/17	.9	Tel. w/ Cannon re: off-the-clock hours; missing holiday time; missing receiver and inventory time; Research re: fishing tournament dates; Draft schedule of corrected hours of work (.9).
10/9/17	.8	Tel. w/ J. Cannon re: off-the-clock time; Revise and send schedule of adjusted hours (.8).
10/12/17	.6	Tel. w/ M. Wallace re: off-the clock work hours; Micky Finn co-workers; Draft and send schedule of adjusted hours of work (.6).
10/14/17	.8	Multi-Tel. w/ Micky Finn co-workers re: M. Wallace's off-the clock hours; Revise schedule of work hours (.8).
10/16/17	2.1	Draft First Amended Complaint; Tel. w/ HBH re: same, Tel. w/ Wallace re: individual Defendants; Tel. w/ Cannon re: same (1.4); Draft motion for Leave to File Amended Complaint (.7).
10/25/17	.5	Conf. call w/ Defense counsel and HBH re: discovery issues/case status (.2); Review damage calculation hours; Email revisions to E. Schulman (.3).
10/29/17	.5	Tel. w/ Elana Schulman; Review expert report (.5);
10/30/17	1.8	Multi-Tel w/ Elana Schulman; Multi-Tel w/ HBH; Conf. call re: revised Expert Report/Damage Calculations (1.8).
10/31/17	.2	Review correspondence to

		defense counsel; Tel. w/ HBH re: discovery disputes/case strategy (.2)
Lodestar – 10/31/17	[9.7]	
11/2/17	2.5	Prepare written discovery responses; Draft M. Wallace Answers to Interrogatories and RFP Responses (2.5).
11/3/17	.5 [Write-off 1.4]	Draft J. Cannon discovery responses; Revise Wallace discovery responses (1.9) (write-off 1.4).
Total:	12.6	

EXHIBIT I



Cannon v Sunset Grille
 Total Damages
 10/30/17
 E. Schulman

Plaintiff	Minimum Wage			Overtime			Total		
	Straight	2X	3X	Straight	2X	3X	Straight	2X	3X
Cannon	\$ 15,046.14	\$ 30,092.28	\$ 45,138.43	\$ 8,780.62	\$ 17,561.25	\$ 26,341.87	\$ 23,826.77	\$ 47,653.53	\$ 71,480.30
Wallace - Micky Fins	\$ 2,970.00	\$ 5,940.00	\$ 8,910.00	\$ 1,113.75	\$ 2,227.50	\$ 3,341.25	\$ 4,083.75	\$ 8,167.50	\$ 12,251.25
Wallace - Sunset Grille	\$ 7,877.21	\$ 15,754.43	\$ 23,631.64	\$ 1,558.97	\$ 3,117.94	\$ 4,676.91	\$ 9,436.18	\$ 18,872.37	\$ 28,308.55
Total	\$ 25,893.36	\$ 51,786.71	\$ 77,680.07	\$ 11,453.35	\$ 22,906.69	\$ 34,360.04	\$ 37,346.70	\$ 74,693.40	\$ 112,040.10